

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ROSY GIRON DE REYES; JOSE
DAGOBERTO REYES; FELIX ALEXIS
BOLANOS; RUTH RIVAS; YOVANA
JALDIN SOLIS; ESTEBAN RUBEN
MOYA YRAPURA; ROSA ELENA
AMAYA; and HERBERT DAVID
SARAVIA CRUZ,

Plaintiffs,

vs.

WAPLES MOBILE HOME PARK
LIMITED PARTNERSHIP; WAPLES
PROJECT LIMITED PARTNERSHIP; and
A.J. DWOSKIN & ASSOCIATES, INC.,

Defendants.

Civil Action No. 1:16-cv-563-TSE-TCB

JOINT MOTION FOR ORDER REGARDING ELECTRONIC DISCOVERY

The parties, by counsel, hereby move this Court to enter the attached proposed Order Regarding Electronic Discovery.

WHEREFORE, the Plaintiffs and Defendants respectfully request that the Court enter the attached order regarding electronic discovery.

Dated: August 17, 2016

Respectfully submitted,

/s/ Paul Brinkman

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

Paul Brinkman, VSB # 35950

Jeanhee Hong (*pro hac vice*)

Ariel Wade Trajtenberg (*pro hac vice*)

Diego Duran de la Vega (*pro hac vice*)

Jongwook Kim (*pro hac vice*)

William A. Margeson (*pro hac vice*)

777 Sixth Street NW, 11th Floor
Washington, District of Columbia 20001
Phone: (202) 538-8000
Fax: (202) 538-8100

paulbrinkman@quinnemanuel.com

jeanheehong@quinnemanuel.com

arieltrajtenberg@quinnemanuel.com

diegoduran@quinnemanuel.com

wookiekim@quinnemanuel.com

billmargeson@quinnemanuel.com

LEGAL AID JUSTICE CENTER
Simon Sandoval-Moshenberg, VSB #77110

6066 Leesburg Pike, Suite 520

Falls Church, VA 22041

Phone: (703) 778-3450

Fax: (703) 778-3454

simon@justice4all.org

Counsel for Plaintiffs

/s/ Michael S. Dingman

REED SMITH LLP

Michael S. Dingman, VSB # 30031

Justin deBettencourt, VSB # 83806

7900 Tysons One Place, Suite 500

McLean, Virginia 22101

Phone: (703) 641-4200

Fax: (703) 641-4340

mdingman@reedsmith.com

jdbettencourt@reedsmith.com

Counsel for Defendants